

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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**CURTIS E. BLACKWELL, II,**

Plaintiff,

vs.

**LOU ANNA K. SIMON**, in her individual capacity as president of Michigan State University, **MARK DANTONIO**, in his individual capacity as Head Football Coach of Michigan State University, **MARK HOLLIS**, in his individual capacity as Director of Intercollegiate Athletics for Michigan State University, **CHAD DAVIS**, Detective, in his individual capacity as a detective for the Michigan State University Police Department, and **SAM MILLER**, Detective, in his individual capacity as a detective for the Michigan State University Police Department,

Defendants.

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Case No. 1:18-cv-01261

HON. JANET T. NEFF

Magistrate Judge Sally J. Berens

**DEFENDANTS DAVIS AND MILLER'S  
MOTION FOR SANCTIONS**

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Defendants Chad Davis and Sam Miller (“Davis and Miller”), through their undersigned counsel, move the Court pursuant to Fed.R.Civ.P. 37(b)(2)(A)(i)-(vii) and the inherent power of this Court to sanction misconduct, to dismiss Plaintiff’s case for the reasons that are detailed in the brief accompanying this motion.

Dated: February 21, 2020

RHOADES McKEE PC

By: /s/ Paul A. McCarthy  
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